

**REMARKS**

Claims 1, 2, 11, 12, 14, 15 and 17 through 22 remain pending in this application. In response to the final Office Action dated March 21, 2006, the present amendment cancels claims 1, 2, 11, 12, 14, 15, 17, 19 and 20, leaving only claims 17, 18, 21 and 22 pending. Entry of the amendment and allowance of the application are respectfully solicited.

Claims 17, 18, 21 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. published application 2003/0220531 (Cortright) in view of U.S. patent publication 2002/0122980 (Fleisher). The rejection is respectfully traversed.

Independent claims 17 and 18 expressly recite that “the proton-conducting substance is a fullerene derivative including an electron-withdrawing group.” Accordingly, “the electron-withdrawing effect of the electron-withdrawing group accelerates dissociation of a proton from a proton-conducting functional group and thus, the proton can easily move via the electron-withdrawing group.” This feature of the invention is described in more detail at page 13, lines 4-8 of the specification.

The Office Action asserts that Cortright teaches the proton-conducting substance is a fullerene derivative (sec. 0018, 0077). Reconsideration of this assertion is respectfully solicited. Contrary to the assertion, Cortright merely teaches “fullerenes” and “fullerene.” Cortright does not teach “a fullerene derivative including an electron-withdrawing group” such as defined at page 13, lines 4-8 of the specification of the present application and as required by claims 17 and 18.

The characteristic feature of claims 17 and 18 whereby “the proton-conducting substance is a fullerene derivative including an electron-withdrawing group” cannot be derived from the references, nor would a skilled person have been motivated by the references either alone or

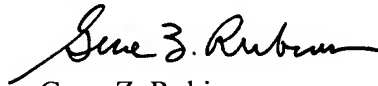
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taken together to arrive at the claimed structure. Accordingly, it is submitted that claims 17, 18, and their dependent claims 21 and 22 are patentably distinguishable.

Entry of the amendment and allowance of the application are respectfully solicited. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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